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16 kathleen.shea@jacksonlewis.com
17 *Appearing Pro Hac Vice*

18 Attorneys for Defendants
19 *Wyndham Vacation Ownership, Inc.*
20 and Demetrius Barnes-Vaughn

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 CHRISTINA JORDAN,
16 Plaintiff,
17 vs.
18 WYNDHAM VACATION OWNERSHIP,
19 INC., a Nevada corporation; DEMETRIUS
BARNES, an individual; DOES I through X,
inclusive; and ROE BUSINESS ENTITIES, I
through X, inclusive

20 Defendants.

21 WENDY REGGE,
22 Plaintiff,
23 vs.

24 WYNDHAM VACATION OWNERSHIP,
25 INC., *et al.*, Defendants.

26 RENEE DEAN,
27 Plaintiff,

vs.
WYNDHAM VACATION OWNERSHIP,
INC., *et al.*, Defendants.

Consolidated for Discovery
Case No. 2:21-cv-02228-CDS-NJK

**SUPPLEMENT TO STATUS REPORT
AND REQUEST TO CONTINUE STAY
FOR ADDITIONAL 30 DAYS**

(Third Request)

Case No. 2:21-cv-02235-JCM-EJY

Case No. 2:22-cv-00141-GMN-NJK

28 Pursuant to the Court's April 3, 2024 Order [ECF No. 112], Defendants Wyndham Vacation
Ownership, Inc. ("Wyndham") and Demetrius Barnes-Vaughn ("Barnes-Vaughn," and collectively

1 “Defendants”), by and through their respective counsel of record, hereby file this Supplement to
2 Status Report and Request to Stay Case for Additional 30 Days (Third Request).

3 1. Defendants filed a Status Report and Request to Continue Stay for Additional 30
4 Days on May 13, 2024. [ECF No. 113].

5 2. At 6:15 p.m.,¹ Plaintiff Wendy Regge emailed undersigned counsel and stated, “We
6 need an extension for hiring an attorney.” *See Exhibit A.*

7 3. On May 14, 2024, Defendants called Plaintiff Regge to discuss her request for
8 extension. Defendants also sent Plaintiff Regge a follow up email. *Id.*

9 4. Defendants do not object to extend the stay in discovery for an additional 30 days.

10 DATED this 15th day of May, 2024.

11
12 JACKSON LEWIS P.C.

13
14 /s/Kathleen C. Shea
15 Kirsten A. Milton, NV State Bar No. 14401
300 S. Fourth Street, Ste. 900
Las Vegas, Nevada 89101

16
17 Kathleen C. Shea, FL State Bar No. 0102837
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Orlando, Florida 32801
Appearing *Pro Hac Vice*

18
19 Attorneys for Defendants
Wyndham Vacation Ownership, Inc.
and Demetrius Barnes-Vaughn

20
21 **CERTIFICATE OF SERVICE**

22 I hereby certify that I am an employee Jackson Lewis P.C. and that on this 15th day of
23 May, 2024, I caused to be sent via ECF filing, a true and correct copy of the above and foregoing
24 and emailed to: Christina Jordan at Airjordan69@icloud.com, Renee Dean at
25 Rdean0730@gmail.com and Wendy Regge at wendyregge@outlook.com.

26
27 /s/ Janet Herrera
Employee of Jackson Lewis P.C.
4854-4190-9182, v. 1

28
1 Undersigned counsel is located in Orlando, Florida and received Regge’s email 9:15 p.m. local time.

EXHIBIT A

Herrera, Janet (Orlando)

From: Shea, Kathleen C. (Orlando)
Sent: Tuesday, May 14, 2024 2:13 PM
To: Wendy Regge
Cc: Milton, Kirsten A. (Chicago)
Subject: RE: Jordan, Dean, and Regge v. Wyndham / Joint Status Report

Hi Ms. Regge,

I just tried calling you. We would have no objection to a 30 day extension.

Thank you,



Kathleen C. Shea

Attorney at Law

Jackson Lewis P.C.

390 N. Orange Avenue

Suite 1285

Orlando, FL 32801

Direct: (407) 246-8404 | Main: (407) 246-8440

Kathleen.Shea@jacksonlewis.com | www.jacksonlewis.com

From: Wendy Regge <wendyregge@outlook.com>

Sent: Monday, May 13, 2024 9:15 PM

To: Shea, Kathleen C. (Orlando) <Kathleen.Shea@jacksonlewis.com>

Subject: Re: Jordan, Dean, and Regge v. Wyndham / Joint Status Report



We need an extension for hiring an attorney

Wendy Regge
702-686-2746

On May 8, 2024, at 3:24 PM, Shea, Kathleen C. (Orlando) <Kathleen.Shea@jacksonlewis.com> wrote:

Hi Ms. Regge,

I just left you a voicemail. I have tried to reach you a few times about this case. Could you please respond to my email or give me a call when you have a chance? As you know, the Court has ordered us to confer about the remaining deadlines in this case. Please let me know if you have retained counsel.

Thank you,



Kathleen C. Shea

Attorney at Law

Jackson Lewis P.C.

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Orlando, FL 32801

Direct: (407) 246-8404 | Main: (407) 246-8440

Kathleen.Shea@jacksonlewis.com | www.jacksonlewis.com

From: Shea, Kathleen C. (Orlando) <Kathleen.Shea@jacksonlewis.com>

Sent: Monday, April 29, 2024 12:20 PM

To: wendyregge@outlook.com

Cc: Milton, Kirsten A. (Chicago) <Kirsten.Milton@jacksonlewis.com>; Wright, Kelly J. (Orlando) <Kelly.Wright@jacksonlewis.com>

Subject: RE: Jordan, Dean, and Regge v. Wyndham / Joint Status Report

Ms. Regge,

Just following up on the email below. Could you please give me a call so we can discuss your case and comply with the Court Order? If you have retained counsel, please let me know and I will confer with her/him.

Thank you,



Kathleen C. Shea

Attorney at Law

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Kathleen.Shea@jacksonlewis.com | www.jacksonlewis.com

From: Shea, Kathleen C. (Orlando) <Kathleen.Shea@jacksonlewis.com>

Sent: Tuesday, April 23, 2024 2:16 PM

To: wendyregge@outlook.com

Cc: Milton, Kirsten A. (Chicago) <Kirsten.Milton@jacksonlewis.com>; Wright, Kelly J. (Orlando) <Kelly.Wright@jacksonlewis.com>

Subject: Jordan, Dean, and Regge v. Wyndham / Joint Status Report

Ms. Regge,

I am one of the defense attorneys for Wyndham in the above-referenced matter. Attached please find a copy of the Court's Order granting Stipulation for Hone Law to Withdraw as Counsel. According to the Order, the Parties are required to file a Joint Status Report on or before May 13, 2024. Could you please let me know if you have retained counsel or intend to retain counsel? If not, I'd like to set up a call within the next week or two so we can discuss the remaining discovery deadlines.

Thank you,



Kathleen C. Shea

Attorney at Law

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